

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
UTICA MUTUAL INSURANCE COMPANY,	:	
	:	
Plaintiff,	:	
	:	
- against -	:	No.: 11-cv-8207 (AKH)
	:	
INA REINSURANCE COMPANY,	:	
N/K/A R&Q REINSURANCE COMPANY,	:	
	:	
Defendant.	:	
-----X	:	

**PLAINTIFF UTICA MUTUAL INSURANCE COMPANY'S  
NOTICE OF MOTION FOR PERMISSION TO FILE UNDER SEAL  
PORTIONS OF UTICA'S FILINGS IN SUPPORT OF ITS OPPOSITION TO  
DEFENDANT R&Q REINSURANCE COMPANY 'S MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon its Memorandum Setting Forth The Reasons Why Sealing Is Appropriate Under the Circumstances, provided to Chambers, Plaintiff Utica Mutual Insurance Company will move this Court for an Order sealing portions of Utica's Memorandum of Law in Opposition to R&Q Reinsurance Company's Motion to Dismiss and the Declaration of Syed S. Ahmad in Support of Utica's Memorandum of Law in Opposition to R&Q's Motion to Dismiss (collectively, the "Opposition") and for such other relief as the Court deems just and proper.

Pursuant to the Honorable Alvin K. Hellerstein's Individual Rule 4.B(i), Utica has filed this Notice of Motion and redacted versions of the Opposition on ECF. Utica has also submitted unredacted copies of the Opposition to Chambers, identifying the specific information sought to be sealed, and a memorandum setting forth the reasons why sealing is appropriate under the circumstances.

Dated: New York, New York  
December 27, 2011

HUNTON & WILLIAMS LLP

By: /s/ Robert J. Morrow  
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*Counsel for Utica Mutual Insurance Company*

**DECLARATION OF SERVICE**

Raymond E. Galbraith, hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

I am a Litigation Paralegal at the law firm of Hunton & Williams LLP, attorneys for Plaintiff Utica Mutual Insurance Company.

That on December 27, 2011, I served a true copy of the foregoing, on counsel of record for Defendant, at the address listed below, via First-Class Mail, by depositing the same in a duly-enclosed and sealed wrapper, with the correct postage thereon, in an official letter box duly maintained by the Government of the United States of America, within the State of New York

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 27, 2011.

/s/ Raymond E. Galbraith  
Raymond E. Galbraith

TO: John F. Finnegan, Esq.  
Michael Samalin, Esq.  
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*INA Reinsurance Company n/k/a R&Q Reinsurance Company*